

III. REMARKS

Claims 1, 3, 4, 6-11 and 13-16 are pending in this application. By this Amendment, claims 1, 13 and 16 have been amended. Applicant does not acquiesce in the correctness of the objections and rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the above amendments and following remarks is respectfully requested.

In the Office Action, claims 1, and 3-4 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Mital et al. (USPN 6,189,012) "Mital," in view of Campbell et al. (USPN 6,292,801) "Campbell"; claims 6-11 are allowed; and claims 13-16 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Mital in view of Campbell, further in view of Sugauchi et al. (USPN 5,828,842) "Sugauchi." Applicant respectfully submits that claims 1, 3-4, and 13-16 are allowable for the following reasons and thus respectfully requests withdrawal of the rejections.

With regard to independent claim 1 (and similarly claim 13), Applicant recites "wherein the hierarchical link table includes an *identifier* of an application program associated with the defined hierarchical structure." For instance, as shown in Applicant's Figure 11, illustrative identifiers are shown as Application AP1 and Application AP2. None of the prior art references teach or suggest a hierarchical link table that includes an identifier of an application program associated with the defined hierarchical structure. Accordingly, Applicant respectfully submits

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that independent claims 1 and 13 are allowable over the art of record. The dependent claims are believed allowable for the reasons discussed herein, as well as for their own additional features.

With regard to independent claim 16, Applicant recites "a hierarchical node database, wherein data used for the application programs is stored as node data in data records, and wherein the hierarchical node database includes effective period data for at least one data record that defines a time period when the at least one data record is effective for each of said plurality of application programs, *wherein said hierarchical node database does not define relationships among the node data.*" The Office Action alleges that this feature (prior to the current amendment) was taught by a combination of Mital and Campbell. However, neither of these references teaches a hierarchical node database that "does not define relationships among the node data" and includes "effective period data."

Specifically, Figure 8 of Campbell only utilizes period data in tables that include relationships among the data (e.g., Sales/Richard Moon). Figures 3 and 4 of Campbell are output files that show, e.g., "call detail records generated by a particular type of PBX," (see column 6, lines 14-20), and are therefore unrelated. Conversely, Applicant provides a hierarchical node database: (1) in which node data is stored independent of the hierarchical relationships, and (2) includes effective period data. Accordingly, because none of the prior art references teach or suggest this combination, Applicant submits that claim 16 is in condition for allowance.

Applicant respectfully submits that the application as presented is in condition for allowance. Should the Examiner believe that anything further is necessary in order to place the

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application in better condition for allowance, the Examiner is requested to contact Applicant's undersigned attorney at the telephone number listed below.

Respectfully submitted,



Michael F. Hoffman
Reg. No. 40,019

Dated: _____

4/20/05

Hoffman, Warnick & D'Alessandro LLC
Three E-Comm Square
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile

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